

TOWN OF FRAMINGHAM REQUEST FOR  
DETERMINATION OF RATES APPLICABLE TO  
TRANSPORTATION AND TREATMENT OF SEWAGE  
PURSUANT TO INTERMUNICIPAL AGREEMENT

The Town of Framingham ("Framingham") hereby submits its Second Set of Information Requests to the Town of Ashland ("Ashland").

1. Each request should be answered in accord with 220 C.M.R. § 1.06(6)(c) and the Ground Rules set forth in the Department's December 9, 2002 Memorandum.

2. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, microfilm, microfiche, computer printouts, correspondence, handwritten notes, bills, checks, and data available from a laptop, hard drive, or server, and any other data compilations from which information can be obtained.

### **INFORMATION REQUESTS**

FRA 2-1. Please state whether Ashland has completed the investigation referenced in Ashland's responses to FRA 1-6 and FRA 1-8. If so, please provide copies of any intermunicipal agreements that apportion each municipality's share of O&M costs based on the percentage of pipe utilized by that municipality, or that utilize IBT flows in apportioning O&M costs.

FRA 2-2. Please state or identify, with respect to the circular strip chart meter readings produced by Ashland in response to FRA 1-11, at Tab 11, numbering 278 pages, the following:

- (a) date of installation of the meter;
- (b) the date on which Ashland first began using the meter to record flow data;
- (c) whether the meter still is working;
- (d) whether the meter was inoperable or shut off for any periods of time between January 1, 1997 to the present, and, if so, the periods of time it was not recording data;
- (e) the exact location of the meter;
- (f) the individual(s) responsible for ensuring that the flow data was being recorded properly on the meter;

- (g) the time period reflected on each page produced, i.e., a week, a month, or a day;
- (h) the individual responsible for reviewing these meter readings to determine whether Ashland's discharges at the Chestnut Street pump station were in compliance with the maximum allowable discharges under the December, 1963 IMA;
- (i) the location of all strip chart meter readings not produced to Framingham, including data for any missing weeks in 1997, 2001, and 2002, and all data for 1998, 1999, and 2000; and
- (j) the name of the person at Ashland most knowledgeable about the documents attached at Tab 11 to Ashland's response.

FRA 2-3. Please state whether Ashland's flows during the week of December 16, 1996, as reflected on proposed Ex. FR-19, exceeded the maximum allowable discharge levels set forth in the IMA?

FRA 2-4. With respect to the first four pages of the documents attached at Tab 12 to Ashland's response, please state or identify:

- (a) the date on which Ashland first began preparing yearly station summaries;
- (b) the individual who prepared the yearly station summaries;
- (c) the individual at Ashland who is most knowledgeable about the yearly station summaries.

FRA 2-5. Please state, with respect to the remaining documents attached at Tab 12 to Ashland's response to Framingham's first set of information requests, which appear to be pump run time meter records for both the Brackett Road and Chestnut Street pumping stations, the following:

- (a) whether Ashland has produced all existing pump run time meter records for both pumping stations for the period January 1, 1997 to the present;
- (b) the individual(s) who prepared the records;
- (c) the individual(s) who are most knowledgeable regarding the records and, if there is more than one individual, the areas of knowledge of each designated individual; and
- (d) the individual responsible for reviewing the meter records to determine whether Ashland's discharges at the two pumping stations were in compliance with the

maximum allowable discharges under the December, 1963 IMA.

FRA 2-6. Please state whether Ashland's flows during the week of April 23, 2000, as reflected on the documents attached at Tab A, exceeded the maximum allowable discharge levels set forth in the IMA for either pumping station, or for both.

FRA 2-7. Please provide any costing information supplied to Ashland in support of its estimate that it would cost approximately \$6,000,000 to construct its own connection to the MWRA's pipelines, including but not limited to any information supplied by Haley & Ward in conjunction with, or following, its March 12, 2002 letter, attached at Tab 22 to Ashland's response to Framingham's first set of information requests. In particular, please provide any cost information provided to Ashland with respect to Tasks 1, 2 or 5, as designated by Haley & Ward in the March 12, 2002 letter.

FRA 2-8. On page 2-10 of the Sewerage Facility Report prepared by Haley & Ward for Ashland in 1991, at § 2i, Haley & Ward recommended that Ashland install hydrogen sulfide control equipment at the Chestnut Street pumping station, at an estimated cost of \$50,000. Did Ashland implement this

recommendation? If so, please provide all documents reflecting the installation of such equipment.

FRA 2-9. Please clarify which of the documents attached at Tab 24 to Ashland's response to Framingham's first set of information requests were produced as part of Haley & Ward's 1991 report, and which were produced as part of Haley & Ward's 1997 update to that report. Also, please state whether Haley & Ward has updated that report since 1997, and produce any documents pertaining to any subsequent updates.

FRA 2-10. Please state the maximum flow that can be pumped through the Brackett Road pumping station in any 24-hour period.

FRA 2-11. Please state the maximum flow that can be pumped through the Chestnut Street pumping station in any 24-hour period.

THE TOWN OF FRAMINGHAM,  
By its attorneys,

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